1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE DISTRICT OF ARIZONA 3 4 MDL NO. 2:15-md-02641-PHX-DGC IN RE: Bard IVC Filters Products Liability Litigation 5 STIPULATION OF DISMISSAL WITH This document relates to: 6 **PREJUDICE** Tarek Hamandi v. C. R. Bard, Inc., et al., Case No. 2:17-cv-00551-DGC. 7 8 COME NOW, Plaintiff, Tarek Hamandi & Ana Lizardo ("Plaintiffs") and 9 Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Defendants"), and file this 10 Stipulation of Dismissal with Prejudice, and in support thereof, respectfully show the Court 11 12 as follows: 13 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and 14 Defendants hereby stipulate to the dismissal of the case listed above with prejudice to the 15 re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own 16 17 costs. 18 WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby 19 respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety with 20 prejudice to the re-filing of same and order that these parties are to bear their own costs. 21 22 Respectfully submitted this 10th day of March, 2021. 23 s/Sean M. Cleary s/Richard B. North, Jr. 24 LAW OFFICES OF SEAN M. CLEARY, Richard B. North, Jr. P.A. richard.north@nelsonmullins.com 25 NELSON MULLINS RILEY & 19 West Flagler Street, Suite 618 SCARBOROUGH LLP 26 Miami, FL 33130 201 17th St. NW, Ste. 1700 P: 305.416.9805 Atlanta, GA 30363 27 F: 305.416.9807 P: 404.322.6000

F: 404.332.6397

sean@clearypa.com

Boston, MÅ 02210

28

1	Attorneys for Plaintiffs	Attorneys for Defendants C. R. Bard, Inc. and Bard Peripheral Vascular Inc.
2		una Bara I eripherai vascular Inc.
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
	-	- 2 -